

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re: GEORGE D. MCCONNELL, aka :** **Chapter 13**  
George Douglas McConnell, aka : **Case No. 18-15806-PMM**  
George McConnell, :  
Debtor :

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

AND NOW COMES Debtor(s) **GEORGE D. MCCONNELL**, by and through their attorneys, J. ZAC CHRISTMAN, ESQUIRE, and in Response to the Trustee's Motion to Dismiss avers:

1. Admitted.
2. Admitted.

3. Admitted in part and Denied in part. In September, Debtor received a document in the mail that caused him to believe his Plan payments were complete. Counsel for Debtor advised Debtor that he was required to pay \$80 to complete his Chapter 13 Plan payments on receipt of the Motion to Dismiss. Debtor obtained a certified check for \$80 on October 24, 2023, and placed his case number on the instrument for mailing to the Trustee on October 25, 2023.

WHEREFORE, Debtor(s) **GEORGE D. MCCONNELL** respectfully pray(s) this Honorable Court for an Order that the Trustee's Motion to Dismiss be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

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/s/ J. Zac Christman  
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